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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Anika Romano,

Plaintiff,

vs.

Trans Union LLC; Citicorp Credit
Services, Inc. (USA) dba Citicards;
Harris & Harris Ltd.; and Bank of
America, N.A.,

Defendants.

CASE NO.: 2:22-cv-00168-APG-NJK

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR TRANS UNION TO
ANSWER COMPLAINT**

Plaintiff Anika Romano ("Plaintiff") hereby files her Unopposed Motion for Extension of Time for Trans Union to Answer ("Motion") and in support states:

1. Trans Union's responsive pleading is due on February 22, 2022.
2. Plaintiff and Trans Union are actively engaged in case-resolution negotiations.
3. Plaintiff does not oppose an extension of TransUnion's time to Answer the Complaint so that the parties may devote their energies to resolving this matter. Trans Union files this


Motion consistent with its agreement with Plaintiff and further files this Motion respectfully requesting the Court for an extension of time to file its responsive pleading for 30 days, to **March 24, 2022**.

4. The Motion is filed in good faith and not for delay.
5. This is the first request for an extension of time for Trans Union to answer complaint and the requested extension does not prejudice the parties.
6. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date, to **March 24, 2022**, on which Defendant must answer or otherwise respond to Plaintiff's Complaint.

Dated: February 18, 2021.

	<p>FREEDOM LAW FIRM</p> <p>By: <u>/s/ Gerardo Avalos</u> George Haines, Esq. Nevada Bar No. 9411 Gerardo Avalos, Esq. Nevada Bar No. 15171 8985 S. Eastern Ave, Suite 350 Las Vegas, Nevada 89123 (702) 880-5554 (702) 385-5518 (fax) Ghaines@freedomlegalteam.com Gavalos@freedomlegalteam.com <i>Counsel for Plaintiff Evelyn Jones</i></p>
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IT IS SO ORDERED.


United States Magistrate Judge

DATED: February 22, 2022